

EXHIBIT 2

**DECLARATION OF BRIAN J. PEZZILLO, ESQ. IN SUPPORT OF MOTION FOR
PARTIAL SUMMARY JUDGMENT REGARDING VIOLATION OF DUE PROCESS –
42 U.S.C. § 1983**

I, Brian J. Pezzillo, Esq., hereby state:

1. I am an attorney with Howard & Howard Attorneys PLLC, I am licensed to practice law in all courts of the State of New Mexico, and I am one of the attorneys representing Dr. Gavin Clarkson in this matter.

2. I have personal knowledge of the facts set forth herein and am competent to testify to the same.

3. I make this declaration in support of Dr. Clarkson's Motion for Partial Summary Judgment Regarding Violation of Due Process – 42 U.S.C. § 1983 (the "Motion").

4. Attached as Exhibit 1 to Dr. Clarkson's Motion is a true and correct copy of Dr. Clarkson's Declaration in Support of the Motion.

5. Attached as Exhibit 1-A to Dr. Clarkson's Motion is a true and copy of the Dr. Clarkson's pre-termination administrative hearing recording (the CD with the audio recording is forthcoming in the mail).

6. Attached as Exhibit 2-A to Dr. Clarkson's Motion are true and correct copies of documents produced by Defendants or produced by Dr. Clarkson in this matter.

I declare under penalty of perjury under the laws of the state of New Mexico that the foregoing is true and correct.

Dated this 11th day of January, 2020

/s/ Brian J. Pezzillo
Brian J. Pezzillo, Esq.